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January 15, 2004

Ms. Carol Mitten, Chair
Zoning Commission of DC
Room 210
441 4th Street, N.W.
Washington, DC 20001

Re: Request for Party Status in ZC Case No. 03-16 - Monument Realty, LLC Watergate Hotel

Dear Ms. Mitten:

I represent Watergate West, Inc. and Watergate South, Inc., cooperative buildings in the Watergate Complex which will be greatly impacted by the proposed modification of the Watergate Planned Unit Development (PUD) to permit conversion of the Watergate Hotel to a condominium. We seek party status in the subject case, scheduled for hearing on January 29, 2004.

Attached are statements setting forth the interests and concerns of the respective cooperatives. They fully justify this request for party status.

Although we are still open to continuing discussions with Monument Realty and attempting to reach a written understanding, we are not sufficiently advanced in that process to do other than express profound opposition.

We plan to put on the following witnesses:

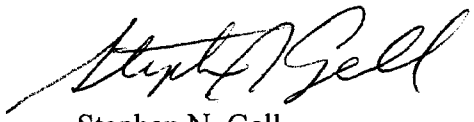
1. The presidents of the Boards of Watergate West and Watergate South or their representatives
2. A planner for whom we would seek expert status
3. A heating and cooling engineer for whom we would seek expert status
4. Residents of the cooperatives with personal perspectives on the operation of the facilities and their importance to residential life at the Watergate.

ZONING COMMISSION
District of Columbia
Case 03-16
Exhibit 31

ZONING COMMISSION
District of Columbia
CASE NO.03-16
EXHIBIT NO.31

I will be happy to answer any questions you may have and to provide additional information.

Yours very truly,



Stephen N. Gell

WATERGATE SOUTH – STATEMENT SUPPORTING REQUEST FOR PARTY STATUS

1). How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission?

A. The Watergate complex is nationally admired for its urban mixture of residential buildings, office buildings, hotel facilities, shops, and conveniences. Its location by the river and its proximity to governmental, business, cultural, and educational edifices, have made it one of the most desirable sites in the District. Grant of the PUD modification will remove from the complex an important amenity on which the residents relied when they purchased their shares and which they use frequently.

2). What legal interest does the person have in the properties?

A. Watergate South, Inc. manages and speaks for the residents of Watergate South Cooperative, who are its shareholders.

3). What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission?

A. Watergate South is part of the PUD development which incorporates the subject hotel seeking conversion to condominium use. The distance is approximately 130 feet.

4). What are the environmental, economic or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission is approved or denied?

A. The residents of Watergate South purchased their interests in the building based on the ambiance of the Planned Unit Development approved by the Zoning Commission in 1962. They like the mix of residential, office and hotel uses, each providing mutual benefits to the other. The convenience of having a hotel for family and guests, a first class restaurant and rooms for entertaining will be threatened by a modification of the PUD and could diminish the value of the units on resale.

B. As described below, all the buildings in the Watergate Complex share heating and cooling facilities. Payments are assessed according to a complicated formula derived at the inception of the project. The preservation of this arrangement and the need to assure enforcement of its terms creates concerns when one building proposes to alter its character, use, and form of ownership.

C. Residents of the cooperatives (West, East, and South) have the right to membership in the health club located in the hotel building, at a reduced

charge. The change to a condominium could deprive the residents of that important, life-enhancing, amenity.

D. For a prolonged period of time, construction of the condominium is likely to carry with it substantial inconvenience to residents: dust, diminished accessibility, increased traffic by oversized vehicles, and loss of parking spaces.

E. The proposed above ground parking will be unsightly. Watergate South apartments overlook the front of the hotel where this additional parking is to be placed.

5). How will the person's interest be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

A. The Watergate Complex is somewhat isolated from other residential areas of the city. One would have to walk or ride several blocks to access the entertainment facilities, restaurant, health club, and guest rooms offered by a first class hotel like the Watergate Hotel. Moreover, because of the proximity of the Hotel, residents of the Watergate Complex are more likely to use the facilities than members of the general public.

B. Agreements among the building owners for the centralization of heating and cooling facilities, as well as the sharing of energy costs according to a complicated formula, give these various owners an extra measure of interest in the ownership and character of the buildings. The formula particularly disfavors Watergate South in the event that any of the buildings exceeds their allotted demand rate. The Hotel converting to a condominium rather than a cooperative raises issues of enforceability of the terms and conditions of the agreement. This may have a substantial negative financial impact on Watergate South.

WATERGATE WEST

STATEMENT SUPPORTING REQUEST FOR PARTY STATUS

1). How will the property owned or occupied by such person, or in which the person has an interest be affected by the action requested of the Commission?

A. The Watergate complex is nationally admired for its urban mixture of residential buildings, office buildings, hotel facilities, shops, and conveniences. Its location by the river and its proximity to governmental, business, cultural, and educational edifices, have made it one of the most desirable sites in the District. Grant of the PUD modification will remove from the complex an important amenity on which the residents relied when they purchased their shares and which they use frequently.

2). What legal interest does the person have in the properties?

A. Watergate West Cooperative is part of the PUD development of the Watergate Complex. Watergate West operates through an elected Board of Directors; the owners of the cooperative are its shareholders under the laws governing cooperative residences.

3). What is the distance between the person's property and the property that is the subject of the appeal or application before the Commission?

A. Watergate West is immediately adjacent to the subject hotel, across a shared driveway. It is directly connected by underground walkway through the garage and elevators.

4). What are the environmental, economic, or social impacts that are likely to affect the person and/or the person's property if the action requested of the Commission is approved or denied?

A. All owners of Watergate West purchased their property based on the Planned Unit Development established by the Zoning Commission in 1962. The mix of residential, office and hotel uses provides mutual benefits, supporting the premier status of the Watergate complex, and reflected in the market value of the property. The advantages and conveniences of having a connected hotel for family and guests, a first class restaurant and lounge, a health club and meeting rooms, cannot be preserved by the conversion of the hotel to a residence.

B. The economic impact is straightforward: a major reduction in the amenities of the Watergate Complex will directly diminish the value of the property owned by Watergate West. The offers made by the developers cannot compensate

for the loss in property value and social convenience of this major change in the Complex.

C. The change also affects the long-established position of the Complex as a premier site in the District. The owners of Watergate West benefit from this status and from the contribution of this site to the District. Watergate West owners enjoy this status, which they view as a crown jewel of the District's residential structure, and are taking this action to preserve it.

D. For a prolonged period of time, construction of the condominium is likely to carry with it substantial inconvenience to residents: dust, diminished accessibility, increased traffic by oversized vehicles, and loss of parking spaces.

5). How will the person's interest be more significantly, distinctively, or uniquely affected in character or kind by the proposed zoning action than that of other persons in the general public.

A. The Watergate Complex is self-contained, and somewhat isolated from other residential areas of the city. The hotel is accessed without the need to go outdoors. If the owners would now have to travel to seek corresponding amenities outside of the Complex, the convenience of the Complex is lost. This advantage of the connection between the hotel and the residences has no substitute if the hotel is converted.

B. Loss of amenities and conveniences that were present when current owners purchased their residences in the Watergate Complex will affect the value of each Watergate West residence, affecting the owners of 143 residential units.

Watergate South Cooperative
700 New Hampshire Ave, N.W.
Washington, DC 20037

Ms. Carol Mitten, Chair
DC Zoning Commission
Room 210
441 4th Street, N.W.
Washington, DC 20001

Re: Watergate PUD Modification
ZC Case No. 03-16

Dear Ms. Mitten:

This will authorize Stephen N. Gell to represent the Watergate South Cooperative and bind it in proceedings on the subject matter before the Zoning Commission of the District of Columbia.

Dr. Neil C. Livingstone, President

Watergate West Cooperative
2700 Virginia Ave, N.W.
Washington, DC 20037

Ms. Carol Mitten, Chair
DC Zoning Commission
Room 210
441 4th Street, N.W.
Washington, DC 20001

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ZC Case No. 03-16

Dear Ms. Mitten:

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Ben Man, President